

# EXHIBIT A

Declaration of Jay Geraci

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT CLEVELAND**

In re:

SONIC CORP. CUSTOMER DATA  
BREACH LITIGATION

Case No. 1:17-md-02807-JSG

**DECLARATION OF JAY GERACI,  
ON BEHALF OF THE SETTLEMENT  
ADMINISTRATOR, REGARDING  
CYPRES**

I, Jay Geraci, declare:

1. I am Vice President at Kurtzman Carson Consultants LLC ("KCC"), located at 1 McInnis Parkway, Suite 250, San Rafael, California. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. KCC is a class action administrator that specializes in providing comprehensive class action services including, but not limited to, pre-settlement consulting, email and mailing campaign implementation, website design, claims administration, check and voucher disbursements, tax reporting, settlement fund escrow and reporting, class member data management, legal notification, call center support, claims administration, and other related services critical to the effective administration of class actions. KCC has developed efficient, secure and cost-effective methods to properly handle the voluminous data and mailings associated with the noticing, claims processing and disbursement requirements of settlements to ensure the orderly and fair treatment of class members and all parties of interest.

3. The purpose of this declaration is to provide the Parties and the Court with a summary and the results of the work performed by KCC related to the distribution of funds.

4. On or around, January 16, 2019, KCC received \$4,325,000.00 in funding for the

settlement. After paying Attorney fees and costs, the named plaintiffs, and settlement administration fees, \$2,588,656.67 in funds were available for the class.

5. On November 15, 2019, KCC sent 42,826 checks totaling \$2,308,462.84 and 8,245 PayPal payments totaling \$267,467.80 to class members. On or around January 1, 2020, KCC received \$11,678.40 representing 360 failed or returned PayPal payments. As a result, \$24,404.43 in funds were in the Settlement Fund and available.

6. On February 4<sup>th</sup>, and July 10, 2020, KCC mailed out 392 checks to Class Members whose original PayPal payments failed, or who provided updated information to be included in the distribution. The 392 checks totaled \$13,397.48.

7. On February 4<sup>th</sup>, 2020, the Settlement Fund had \$11,006.95 in funding.

8. On or around November 1, 2020, KCC stopped 2,775 checks that were beyond their stale date and returned \$152,695.08 to the Settlement Fund. As a result, \$163,702.03 in funds were in the Settlement Fund.

9. As of February 14, 2025, the Settlement Fund holds \$163,702.03 which are available for *Cy Pres*.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 16, 2025

  
A handwritten signature in black ink, appearing to read "J Geraci", is written over a solid horizontal line. Below the line, the name "JAY GERACI" is printed in a bold, sans-serif, all-caps font.